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A Limited Liability Law Partnership

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Attorneys for Trustee Dane S. Field

**UNITED STATES BANKRUPTCY COURT**  
**FOR THE DISTRICT OF HAWAII**

In re

ROLLOFFS HAWAII, LLC,

Debtor.

DANE S. FIELD, Chapter 7 Trustee for  
the Estate of Rolloffs Hawaii, LLC

Plaintiff,

v.

TRASHMASTERS, LLC; CORRIDOR  
CAPITAL LLC; CORRIDOR  
CAPITAL ADVISORS, LLC;  
CORRIDOR TRASHMASTERS, L.P.;  
SPB MANAGEMENT, LLC; SPB  
WASTE, LLC; SPB CAPITAL GP,

Case No. 16-01294  
(Chapter 7)

Adversary Proceeding No. 18-90035

***EX PARTE* MOTION TO EXCEED  
PAGE AND WORD LIMIT FOR  
PLAINTIFF'S OPPOSITION TO  
MOTION TO DISMISS;  
DECLARATION OF SIMON  
KLEVANSKY**

Hearing

Date: April 12, 2019

Time: 10:00 a.m.

Judge: Hon. Robert J. Faris

LLC; SPB CAPITAL PARTNERS,  
L.P.; SPB PARTNERS, LLC; CRAIG  
ENENSTEIN; L. GEOFFREY  
GREULICH; EDWARD A.  
MONNIER; JESSAMYN DAVIS; ARI  
D. BASS; SCOTT R. BULLOCH;  
KENNETH M. PRESSBERG;  
KRISTIAN GOURLAY; DOUGLAS  
L. ASAY; DOUGLAS D. ASAY;  
CHARLES E. LEONARD; BRIAN  
COLBECK; ROLLOFFS HAWAII,  
INC.; THE KNG GROUP, LLC;  
COLBECK CONSULTING LLC;  
JOHN DOES 1-50; JANE DOES 1-50;  
DOE CORPORATIONS 1-50; DOE  
PARTNERSHIPS 1-50; DOE  
ENTITIES 1-50,

Defendants.

Related Docket No. 30

**EX PARTE MOTION TO EXCEED PAGE AND WORD LIMIT  
FOR PLAINTIFF’S OPPOSITION TO MOTION TO DISMISS**

Plaintiff DANE S. FIELD (“Plaintiff” or “Trustee”), Trustee of the estate of ROLLOFFS HAWAII, LLC (the “Debtor”), by and through his attorneys of record, hereby moves this Court, *ex parte*, for an order granting him leave to submit Plaintiff’s Opposition to Motion to Dismiss (“Opposition”), which exceeds the page and word limits for responsive memorandum permitted by Local Rule 7.5 and Local Bankruptcy Rule 9013-2. As drafted, the Opposition currently has a length of 94 pages and 23,291 words.

This motion is brought on the grounds that the Motion to Dismiss is 106 pages long, seeks dismissal of 61 Counts against 16 defendants and deals with complex issues. The additional pages and words are necessary to adequately present the Trustee's responsive arguments to the Motion.

Accordingly, the Trustee respectfully requests that he be permitted to submit the Opposition in a length of up to 94 pages and no more than 23,500 words, somewhat exceeding the limit established by Local Rule 7.5 and Local Bankruptcy Rule 9013-2, and is based upon the Declaration of Simon Klevansky attached hereto, and the records files herein.

DATED: Honolulu, Hawaii, March 19, 2019.

/s/ Simon Klevansky  
SIMON KLEVANSKY  
ALIKA L. PIPER  
ELAINE T. CHOW  
CARISA LIMA KA'ALA DUFFY  
Attorneys for Plaintiff  
Trustee Dane S. Field

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CAPITAL LLC; CORRIDOR  
CAPITAL ADVISORS, LLC;  
CORRIDOR TRASHMASTERS, L.P.;  
SPB MANAGEMENT, LLC; SPB  
WASTE, LLC; SPB CAPITAL GP,  
LLC; SPB CAPITAL PARTNERS,  
L.P.; SPB PARTNERS, LLC; CRAIG  
ENENSTEIN; L. GEOFFREY  
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JOHN DOES 1-50; JANE DOES 1-50;  
DOE CORPORATIONS 1-50; DOE  
PARTNERSHIPS 1-50; DOE  
ENTITIES 1-50,

Defendants.

Case No. 16-01294  
(Chapter 7)

Adversary Proceeding No. 18-90035

**DECLARATION OF SIMON  
KLEVANSKY**

## **DECLARATION OF SIMON KLEVANSKY**

I, SIMON KLEVANSKY, declare, under penalty of perjury, that:

1. I am a partner in the law firm Klevansky Piper, LLP (“KP Law”), attorneys for Plaintiff Dane S. Field, the duly appointed bankruptcy trustee of the estate of Rolloffs Hawaii, LLC (the “Debtor”).

2. I am competent to testify to the matters set forth herein and I make this declaration based upon my personal knowledge, and a review of certain documents and records in this case.

3. I make this declaration in support of the Trustee’s *Ex Parte* Motion to Exceed Page and Word Limit for Plaintiff’s Opposition to Motion to Dismiss (the “Ex Parte Motion”), filed herewith.

4. The Motion to Dismiss (the “Motion”) was filed on February 15, 2019 by the following Defendants: (i) TrashMasters, LLC; (ii) Corridor Capital LLC; (iii) Corridor Capital Advisors, LLC; (iv) Corridor TrashMasters, L.P.; (v) SPB Management, LLC; (vi) SPB Waste, LLC; (vii) SPB Capital GP, LLC; (viii) SPB Capital Partners, L.P.; (ix) SPB Partners, LLC; (x) Craig Enenstein; (xi) L. Geoffrey Greulich; (xii) Edward A. Monnier; (xiii) Jessamyn Davis; (xiv) Ari D. Bass; (xv) Scott R. Bulloch; and (xvi) Kenneth M. Pressberg.

5. The Motion is 106 pages long, seeks dismissal of 61 counts against the defendants and deals with complex issues. The additional words and pages in the Plaintiff's Opposition to Motion to Dismiss, Filed on February 15, 2019 ("Opposition"), are necessary to adequately present the facts of the case and the Trustee's responsive arguments.

6. Accordingly, the Plaintiff respectfully requests that the Court grant his *Ex Parte Motion* and permit him to file the overlength Opposition.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: Honolulu, Hawaii, March 19, 2019.

/s/ Simon Klevansky  
SIMON KLEVANSKY